

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

GIBRON LOPEZ,
a/k/a "Gibbs,"
a/k/a "G,"
LUIS GUERRERO,
a/k/a "Weegi,"
JOSE RODRIGUEZ,
"D.R.," and
JOSE ORTIZ,
a/k/a "Chico,"

Defendants.

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/1/15

PROTECTIVE ORDER

15 Cr. 002 (CM)

WHEREAS, the United States of America seeks to provide in unredacted form certain documents pursuant to Rule 16 of the Federal Rules of Criminal Procedure; and

WHEREAS, some material that the Government seeks to provide contains personal identification information of specific individuals and other private, sensitive and confidential matter; and

WHEREAS, the Government is willing, under the conditions set forth below, to produce such materials;

IT IS HEREBY AGREED by and between the United States of America, Preet Bharara, United States Attorney, by Assistant United States Attorneys Christopher J. DiMase and Gina Castellano, and defendants GIBRON LOPEZ, a/k/a "Gibbs," a/k/a "G", LUIS GUERRERO,

a/k/a "Weegi," JOSE RODRIGUEZ, a/k/a "D.R.," and JOSE ORTIZ, a/k/a "Chico," the defendants (the "defendants"), by and through their respective counsel, that:

1. Any material reflecting (a) personal identification information (including, but not limited to, names, dates of birth, addresses, phone numbers and e-mail addresses) and (b) other private, sensitive and confidential matter, produced by the Government in this action is deemed "Confidential Information" and shall be so identified by the Government.

2. Confidential Information disclosed to the defendants or to counsel during the course of proceedings in this action:

(a) Shall be used by the defendants and counsel only for purposes of the defense of this action;

(b) Shall be maintained in a safe and secure manner solely by the defendants' counsel; shall not be possessed by the defendants, except in the presence of the defendants' counsel; and shall not be disclosed in any form by the defendants or counsel except as set forth in paragraph 2(c) below;

(c) May be disclosed by the defendants or counsel only to the following persons (hereinafter "Designated Persons"):

(i) investigative, secretarial, clerical, and paralegal student personnel employed full-time or part-time by the defendants' counsel;

(ii) independent expert witnesses, investigators, or advisors retained by the defendants' counsel in connection with this action;

(iii) such other persons as hereafter may be authorized by the Court upon motion by the defendants; and


(d) Shall be returned to the Government following the conclusion of the trial of the above-referenced action or upon the defendant's sentencing, as the case may be, and any all copies made of said material shall be shredded, erased, and/or destroyed, as the case may be.

3. The defendants and counsel shall provide a copy of this Order to Designated Persons to whom they disclose Confidential Information pursuant to paragraph 2(c). Prior to disclosure of Confidential Information to Designated Persons, pursuant to paragraph 2(c), any such Designated Person shall agree to be subject to the terms of this Order by signing a copy hereof and providing such copy to the Government and the defendants' counsel.

AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney
Southern District of New York

By:

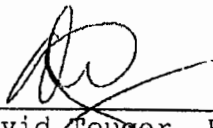


Christopher J. DiMase
Gina Castellano
Assistant U.S. Attorneys

Dated: ~~March~~ April 30, 2015

PELUSO & TOUGER

By:



David Touger, Esq.
Attorney for Defendant Gibron
Lopez

Dated: March ____, 2015

STEWART L. ORDEN

By:

Stewart L. Orden, Esq.
Attorney for Defendant
Luis Guerrero

Dated: March ____, 2015

AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney
Southern District of New York

By: _____
Christopher J. DiMase
Gina Castellano
Assistant U.S. Attorneys

Dated: March ____, 2015

PELUSO & TOUGER

By: _____
David Touger, Esq.
Attorney for Defendant Gibron
Lopez

Dated: March ____, 2015

STEWART L. ORDEN

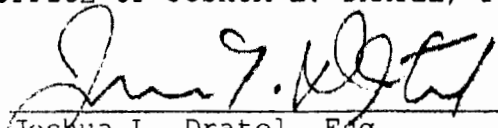
By: Stewart L.
Orden
Stewart L. Orden, Esq.
Attorney for Defendant
Luis Guerrero

Digitally signed by Stewart L. Orden
DN: cn=Stewart L. Orden, o=Attorney at Law,
ou,email=stewartorden@stewartorden.com,
c=US
Date: 2015.03.25 16:12:05 -0400

Dated: March ____, 2015

LAW OFFICE OF JOSHUA L. DRATEL, PC


By:


Joshua L. Dratel, Esq.
Attorney for Defendant Jose
Rodriguez

Dated: April 20, 2015


FEDERAL DEFENDERS OF NEW YORK

By:


Mark B. Gombiner, Esq.
Attorney for Defendant Jose
Ortiz

Dated: April 20, 2015

SO ORDERED:


HONORABLE COLLEEN McMAHON
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

Dated: New York, New York
~~April~~ May, 2015



LAW OFFICE OF JOSHUA L. DRATEL, PC

By: _____
Joshua L. Dratel, Esq.
Attorney for Defendant Jose
Rodriguez

Dated: April ____, 2015

FEDERAL DEFENDERS OF NEW YORK

By: _____
Mark B. Gombiner, Esq.
Attorney for Defendant Jose
Ortiz

Dated: April ____, 2015

SO ORDERED:

HONORABLE COLLEEN McMAHON
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

Dated: New York, New York
May ____, 2015